

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:24-cv-21463-RKA

NEREYDA SUHEY CASTILLO MARENCO,

Plaintiff,

vs.

J.C. PAINTING CONTRACTOR LLC,  
MARIA GONZALEZ, and  
TOMAS GONZALEZ SOTELO,

Defendant.

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**DEFENDANTS' OFFER OF JUDGMENT**  
**RE: ATTORNEY'S FEES AND COSTS**

Defendants, by and through the undersigned counsel, Todd W. Shulby, P.A., pursuant to Rule 68, Fed.R.Civ.P., hereby submit this Offer of Judgment Re: Attorney's Fees and Costs to Plaintiff and, if accepted in accordance with Rule 68, Fed.R.Civ.P., authorizes the Court to enter judgment in favor of Plaintiff, and against Defendants, on the following terms:

- a. This Offer of Judgment Re: Attorney's Fees and Costs is made on behalf of Defendants to Plaintiff.
- b. This Offer of Judgment is conditioned on Plaintiff's acceptance of Defendants' Offers of Judgment for both Counts I and II.
- c. This Offer of Judgment Re: Attorney's Fees and Costs is intended to resolve Plaintiff's claim for attorney's fees and costs as contemplated in Plaintiff's Complaint, including both Counts I and II, and the Offers of Judgment for Counts I and II.
- d. The relevant conditions to this Offer of Judgment Re: Attorney's Fees and Costs are that Defendant pay Twelve Thousand Dollars (\$12,000) to Plaintiff and/or Plaintiff's counsel as

reasonable attorney's fees and costs in satisfaction of the entirety of Plaintiff's claim for attorney's fees and costs in this case.

e. The attorney's fees and costs will be paid within a reasonable time of the Plaintiff's acceptance of this Offer of Judgment Re: Attorney's Fees and Costs and the entry of a final order on this Offer of Judgment.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 23, 2024, a true and correct copy of the foregoing has been served by e-mail to:

Brian H. Pollock, Esq.  
E-mail: [brian@fairlawattorney.com](mailto:brian@fairlawattorney.com)

Patrick Brooks LaRou, Esq.  
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Respectfully submitted,

/s/Todd W. Shulby, Esq.  
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